

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**THE ESTATE OF IRENE W.  
SHELBY, et al.**

Plaintiff,

vs.

**FORD MOTOR COMPANY, et al.,**

Defendants.

Civil Action No.  
Hon.

**(52-3 District Court, Oakland  
County, Michigan Case No.  
22COO157GC)**

**DECLARATION OF JESENKA MRDJENOVIC  
IN SUPPORT OF DEFENDANT FORD MOTOR COMPANY'S  
NOTICE OF REMOVAL**

I, Jesenka Mrdjenovic, hereby declare as follows:

1. I am an attorney with the law firm of Gibson, Dunn & Crutcher LLP, counsel for Defendant Ford Motor Company in the above-captioned suit, and I respectfully submit this Declaration in support of Ford's Notice of Removal. I am admitted to practice in Washington DC, and the States of New York and Michigan. I have personal knowledge of the matters stated herein, and if asked to testify thereto, I could and would do so competently.

2. Attached to the Notice of Removal as **Exhibit B** a true and correct copy of the Service of Process Transmittal, including Summons, Proofs of Service, and Complaint, in *Shelby v. Ford Motor Company, et al.*, No. 22C00157GC, filed

in the 3rd Division of the 52nd District Court of Oakland County, Michigan, on January 21, 2022, and served on Ford on February 10, 2022.

3. Attached to the Notice of Removal as **Exhibit C** is a true and correct copy of the Ford Motor Company General Retirement Plan effective December 31, 2021.

4. Attached to the Notice of Removal as **Exhibit D** is a true and correct copy of the Notice of Removal to be served today on the Clerk of Court for the 3rd Division of the 52nd District Court of Oakland County, Michigan.

I declare pursuant to 28 U.S.C. § 1746 and under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3 day of March, 2022.

/s/ Jesenka Mrdjenovic  
Jesenka Mrdjenovic (P82587)

**CERTIFICATE OF SERVICE**

I hereby certify that on March 3, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, and I hereby certify that I have caused to be served via U.S. mail the foregoing document to the following non-ECF participants:

Robert N. Shelby  
525 Andover Ct.  
Rochester Hills, Michigan 48306

*Pro Se on Behalf of Plaintiff*

/s/ Jesenka Mrdjenovic  
Jesenka Mrdjenovic  
Attorney for Ford Motor Company